



March 1, 1993

Kathy Katz  
NJDEP-Division of Responsible  
Party Site Remediation, CN 028  
401 East State Street  
Trenton, NJ 08625-0028

RE: Hexcel Corporation  
ECRA Case No. 86009

Dear Ms. Katz:

Pursuant to your letter of January 19, 1993 and our telephone conference on February 25, 1993, Killam Associates on behalf of Hexcel, would like to offer the following comments on the January 19, 1993 letter.

- Item 1. Hexcel has requested access from the property owner in question. A copy of this letter will be forwarded to the NJDEPE by Hexcel's lawyer.
- Item 2. In response to the Department's request for the installation of a bedrock monitoring well in the location of MW-1, we would like to offer the following comments. Hexcel recognizes that the apparent hydraulic connection between the overburden and bedrock aquifers in the area of MW-1, indicates the possibility that the bedrock aquifer is affected in this area. However, Hexcel does not concur with the installation of a bedrock well in this area at this time, for the following reasons. Vertical delineation at this location is not necessary for implementing the proposed remedial strategy, i.e. pumping of nearby recovery well CW-5 and six other recovery wells. In fact, vertical delineation at MW-1 will not affect the decision to pump overburden recovery well CW-5. If a deeper screened well is installed in this area, our recommendation would be against pumping the deeper well, because this could draw the highly affected groundwater in the overburden aquifer to deeper depths. Furthermore, it is our opinion that, given the level of contamination present in the overburden aquifer near MW-1, installing deeper wells in this area at this time may offer a vertical pathway for the contamination. We, therefore, propose that the decision to install a bedrock well in this area be deferred until the contaminant levels are reduced in this area.
- Item 3. As agreed to over the telephone, Hexcel will sample MW-2 instead of MW-29. Additionally, CW-10 will be sampled instead of CW-11, since CW-11 has a pump installed in it and is not accessible for sampling. The substituted wells are installed in the same stratum as the original wells. It is understood that the reference to CW-28 in this section actually refers to MW-28.

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- Item 4. Please note that a lower overburden monitoring well MW-3 already exists downgradient of MW-1 (refer to Figure 3: Groundwater Contours - Deep Aquifer (9/18/92), in Conceptual Hydrogeological Model of the Hexcel Site, October 1992).
- Item 5 &
- Item 6. As a result of our discussion over the telephone, it is understood that current Department policy is to discontinue issuance of the 1 ppm individual and 10 ppm total organic contaminant Cleanup Standards, which have recently been approved for some sites located in Class IIB aquifer areas. Current Department policy is that the DEPE will issue Class IIA aquifer Cleanup Standards for all sites. However, regional groundwater quality will influence the Department's decisions regarding the need for and the scope of groundwater cleanup. In this particular case, the DEPE will entertain a proposal for alternate cleanup standards based on achievement of Surface Water Quality Standards in the adjacent Saddle River. The DEPE is expected to issue formal guidance on how to develop such Standards in 1 to 3 months. Therefore, Hexcel proposes to defer this matter until such time as this guidance becomes available.
- Item 7. With the exception of CW-18, all the other wells mentioned have recovery pumps installed in them, and are therefore not accessible for groundwater level measurement. CW-18 has been incorporated into the program.
- Item 9. CW-5 and CW-9 have recovery pumps installed in them, and are therefore not accessible for LNAPL monitoring.
- Item 12. Removal of DNAPL from the subsurface is one of the primary goals of this project. It is Hexcel's earnest wish to start full scale operation of the groundwater recovery system and optimum operation of the DNAPL recovery system as soon as possible. At this time, however, the absence of an effluent discharge permit is seriously restricting the frequency of operation of the DNAPL system. As you are aware, the combined Hexcel/Fine Organics PVSC permit expired at the end of November, 1992. The PVSC indicated their willingness to grant an extension to this permit, until such time as a separate sewer line for the Hexcel discharge is constructed, and Hexcel is issued their own discharge permit. Construction of a separate sewer line has been identified as one of the conditions of the PVSC permit to be issued for Hexcel. In November 1992, Hexcel initiated the design/permitting process for this separate sewer line, with the intention that the groundwater recovery system operation could begin on the combined Fine Organics/Hexcel permit extension. As mentioned in the last few progress reports, Fine Organics (whose concurrence is required for PVSC

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to extend the combined permit) refused to allow such an extension to be granted, thereby forcing Hexcel to postpone groundwater recovery system start up until a separate sewer line is constructed. Given this situation, Hexcel is negotiating with Fine Organics, and is trying to achieve a speedy resolution to this matter. As requested by the Department, we are providing a detailed schedule for system start up and other tasks with this letter. This schedule is based on the assumption that the system will start up upon issuance of a separate PVSC permit for Hexcel. However, if in the meantime, the Fine Organic's situation is resolved to Hexcel's satisfaction, the start up may occur sooner than indicated on the schedule.

Hexcel proposes to install a dedicated DNAPL recovery pump in monitoring well MW-8. This pump will be operated (along with pumps in RW7-1 and RW7-5) at rates and frequencies which will yield optimum DNAPL recovery (to be determined in the field). A formal protocol for operation of these pumps will be put in place as soon as Hexcel receives a discharge permit.

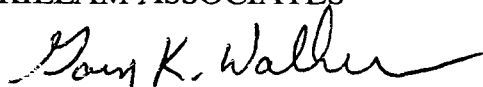
- Item 15. A detailed schedule for system start up and all related tasks is attached. Figure 1 presents a summary of the tasks to be performed as part of the start up procedures. Figure 2 presents a time line schedule for groundwater remedial tasks. Please note that if Fine Organics agrees to the renewal of the combined Hexcel/Fine Organics permit, the start up date will most likely be moved up by about 3 to 4 months.

Monthly progress reports will continue to be submitted. With regard to the Department's request for Hexcel to submit a date for the final report on groundwater remediation, please note that it is not possible at this time to predict the length of time required to achieve remedial goals at this site. However, for administrative purposes, it can be assumed that the groundwater remediation system will continue to operate for at least five years. At the end of this period ( i.e. 1998), a final report or a status report will be submitted.

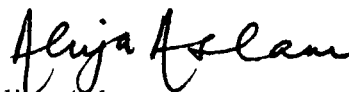
Again, we appreciate the time that you and Beverly Phillips took to discuss these issues with us. If you have any questions or comments, please feel free to call.

Very truly yours,

KILLAM ASSOCIATES

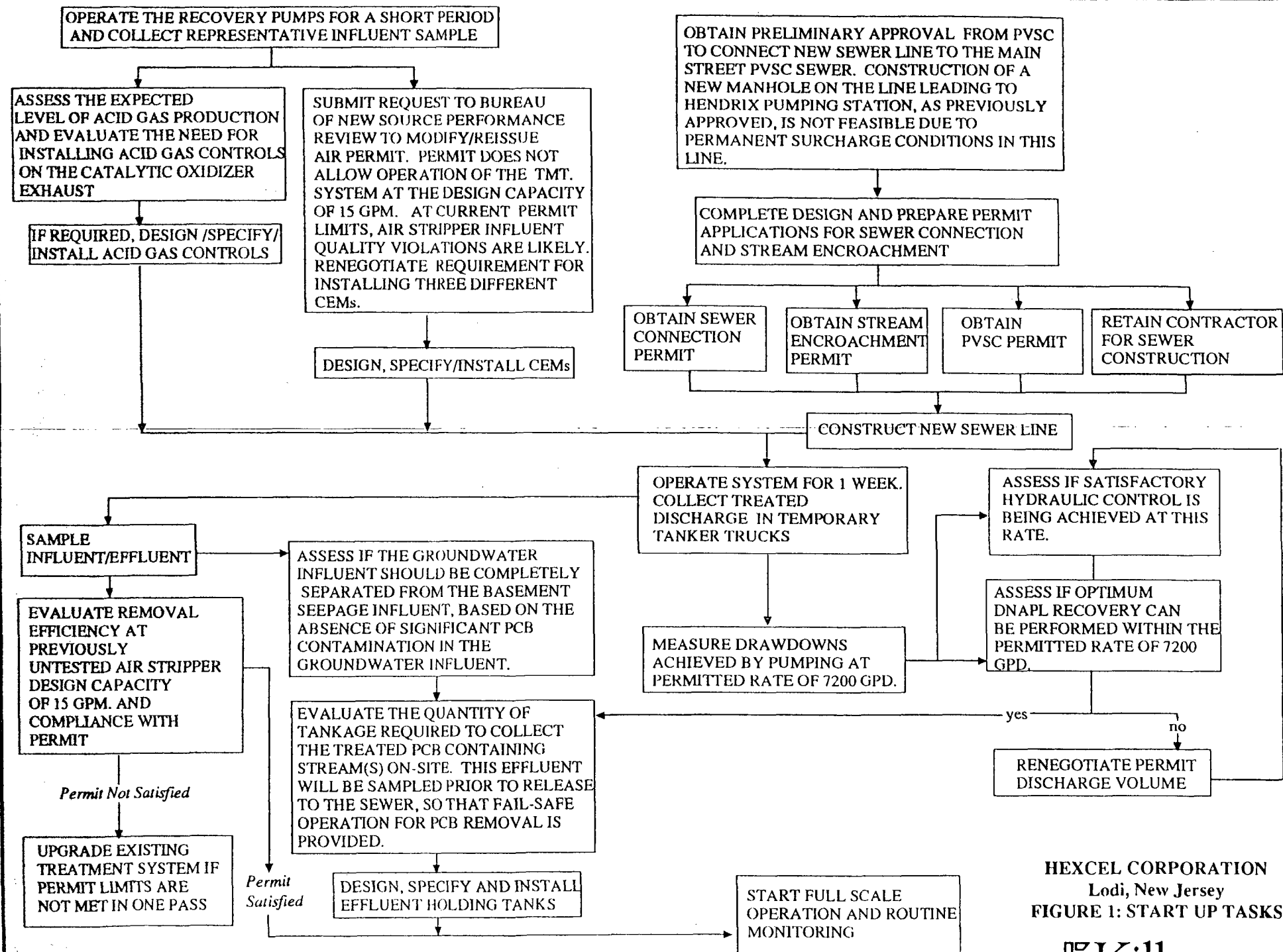


Gary K. Walker  
Senior Project Scientist



Aliya Aslam  
Waste Management Division

883860003



HEXCEL CORPORATION  
Lodi, New Jersey  
FIGURE 1: START UP TASKS

### FIGURE 2: GROUNDWATER REMEDIATION SCHEDULE

